

EXHIBIT 2

From: [Cragg, Tyler E.](#)
To: [Daniel A. Taylor](#); [Noa, Jesse L.](#); [Davis, Matthew F.](#); [Steele, Myron T.](#)
Cc: [Jason Miller](#); [Daniel Markham](#)
Subject: RE: Chow v. Canyon Bridge Capital Management, LLC, C.A. No. 22-947-JLH-SRF
Date: Friday, September 13, 2024 3:55:04 PM
Attachments: [imageaace92.PNG](#)

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Daniel,

Following up on your call to Jesse regarding today's deadline. We do not agree to submit Plaintiff's proposed scheduling order as doing so would moot Defendants' outstanding motion. Given the briefing schedule the Court entered, it is clear that Judge Fallon intends to promptly rule on Defendants' motion. We think that the parties should instead enter into a stipulation extending the deadline until five days after the Court rules on Defendants' motion. This will permit the Court time to consider Defendants' motion and then give the parties an opportunity for a constructive scheduling conversation should the motion be denied. If you will not agree, at a minimum Defendants cannot agree to the proposed trial dates because Defendants' Delaware counsel has a conflict with another trial at that time.

Best,
Tyler

Tyler E. Cragg | Associate

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From: Daniel A. Taylor <DAT@skjlaw.com>

Sent: Friday, September 13, 2024 10:05 AM

To: Noa, Jesse L. <jnoa@potteranderson.com>; Davis, Matthew F. <mdavis@potteranderson.com>; Cragg, Tyler E. <tcragg@potteranderson.com>; Steele, Myron T. <msteele@potteranderson.com>

Cc: Jason Miller <jm@skjlaw.com>; Daniel Markham <dmarkham@wmlawny.com>

Subject: [EXT] RE: Chow v. Canyon Bridge Capital Management, LLC, C.A. No. 22-947-JLH-SRF

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Hi Jesse,

Following up my earlier email with the Joint Proposed Scheduling Order and cover letter for Judge Fallon due today. Despite Defendants' motion, Her Honor's Oral Order did not terminate this deadline. Let me know if you have any comments or edits. If we need to get on the phone to discuss, let me know, and we can make that happen.

Daniel

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From: Daniel A. Taylor

Sent: Monday, September 9, 2024 5:21 PM

To: jnoa@potteranderson.com; mdavis@potteranderson.com; Tyler E. Cragg (tcragg@potteranderson.com) <tcragg@potteranderson.com>

Cc: Jason Miller <jm@skjlaw.com>

Subject: Chow v. Canyon Bridge Capital Management, LLC, C.A. No. 22-947-JLH-SRF

Hi Jesse,

Thanks for the call earlier today. Plaintiff does not consent to extend time for the Rule 16 conference.

Also, since we are to present a joint proposed scheduling order on Friday 9/13, we have

prepared a draft Scheduling Order with the directed sections of Judge Fallon's and Judge Hall's form orders. We look forward to your comments.

Daniel



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